

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**DEFENDANTS' AMENDED NOTICE TO TAKE THE EXPERT
DEPOSITION OF J. ALEX HALDERMAN, Ph.D.**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, counsel for Defendants Brad Raffensperger, et al., will take the deposition upon oral examination under oath of Plaintiffs' expert, J. Alex Halderman, Ph.D. on Wednesday, November 17, 2021, beginning at 8:00 a.m. and continuing thereafter until completed via Zoom videoconferencing through Veritext Legal Solutions. Details regarding the videoconferencing will be emailed to those participating once all arrangements are finalized.

The deposition shall be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The deposition will be taken by oral examination with a written and/or sound and visual record made thereof (e.g., videotape, LiveNote, etc.). The deposition will be taken for the purposes of cross-examination, discovery, and for all other

**Exhibit
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purposes permitted under the Federal Rules of Civil Procedure or any other applicable law.

NOTICE TO PRODUCE

At the time of the deposition, and pursuant to Rule 26(b)(4)(C)(i)-(iii), the deponent is requested to produce all communications between the deponent and counsel for Plaintiffs that:

1. Relate to compensation for the expert's study or testimony;
2. Identify facts or data that the plaintiffs' attorney(s) provided and that the expert considered in forming the opinions to be expressed; or
3. Identify assumptions that the plaintiffs' attorney(s) provided and that the expert relied on in forming the opinions to be expressed.

The deponent is further requested to produce all data and programs utilized in the development of the opinions in declarations submitted in this case regarding the DRE system challenged in Curling Plaintiffs' Third Amended Complaint and the BMD system challenged in Curling Plaintiffs' Third Amended Complaint. This request specifically includes:

1. A copy of any schematic or plan used to configure the Raspberry Pi(s) utilized to attempt adversarial objectives described in the Report, whether self-created or provided through a third-party source (i.e. the internet).
2. A copy of the source code and all libraries used to make Python scripts utilized to attempt adversarial objectives described in the Report.

3. All documents that evidence, refer, reflect, or relate to the process of creating, compiling, and running the adversarial attacks described in the Report, including command lines, links to relevant files, and/or flow charts.

4. All documents that evidence, refer, reflect, or relate to any resources used to accomplish or attempt the adversarial attacks described in the Report.

5. All documents that evidence, refer, reflect, or relate to reference material, hardware manuals, or similar documents used to attempt the adversarial objectives described in the Report.

6. All documents or notes related to adjusting source code or altering any hardware device used in attempting the adversarial objectives described in the Report.

7. The source code for the alteration of the Dominion BMD and printer about which Dr. Halderman testified in the September 2020 preliminary injunction hearing.

This 11th day of November, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that, on November 11, 2021, I caused to be served the foregoing **DEFENDANTS' AMENDED NOTICE TO TAKE THE EXPERT DEPOSITION OF J. ALEX HALDERMAN, Ph.D.** by email to the following:

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This 11th day of November, 2021.

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